

1 Q. Okay, and how often does it occur today?

2 A. Two to three times a week.

3 Q. And who are you seeing for that now?

4 A. Dr. Duwanjee.

5 Q. And what is the treatment now?

6 A. All I can do is take my meds for the pain and
7 physical therapy.

8 Q. And how often do you go to physical therapy?

9 A. Twice a week.

10 Q. And that's in Arizona?

11 A. Yes.

12 Q. And where is that? What is the name of the
13 physical therapy place?

14 A. Endurance Rehabilitation.

15 Q. What city?

16 A. Scottsdale.

17 Q. And Dr. Duwanjee is the one who has prescribed
18 that physical therapy for you?

19 A. Yes.

20 Q. And the cold and purple, is it the same -- you
21 say it happens now two to three times weekly, and
22 before initially it was two to three times daily. Is
23 that correct?

24 A. Yes.



1 Q. Is it the same today as it was initially?

2 MR. LEVIN: Could you rephrase --

3 Q. Sure. In terms of, you said to me earlier that
4 it was cold and purple from about the knee down
5 initially. And you went to the hospital for that
6 because it was cold and purple. What I'm asking is --
7 and you said that happened two to three times a day
8 when you were in the hospital, and then you said it
9 happens now two to three times a week. What I want to
10 know is, the cold and purple, is it the same thing
11 from the knee down, is it cold and purple the same as
12 it was initially?

13 A. Yes.

14 Q. And do you see any other physicians other than
15 Dr. Duwanjee for that?

16 A. Not at this time.

17 Q. Have you had any other hospitalizations
18 regarding this incident, other than the one in August
19 of '02?

20 A. No.

21 Q. Have you had any surgery regarding this
22 incident?

23 A. No.

24 Q. Now, there came a time when you had a fracture



1 in November of '02. And the complaint indicates that
2 sometime in November you stepped off a curb, a normal
3 size curb. Where did that occur?

4 A. Parking lot of Applebee's.

5 Q. And what were you doing?

6 A. Going to get in the car.

7 Q. And when was this? What time of day?

8 A. 9:00 at night.

9 Q. And had you had any pain in your toes in that
10 area prior to this incident?

11 A. It hurt all the time.

12 Q. And had you had any x-rays for a potential
13 break prior to this incident?

14 A. Yes.

15 Q. And who ordered those x-rays?

16 A. Dr. DiPretoro.

17 Q. And what were the results --

18 A. Negative.

19 Q. -- if you remember. Okay. And after this
20 incident, what did you do?

21 A. Called --

22 Q. Well, actually, what happened? Could you
23 describe what happened first?

24 A. Came out of the restaurant and went to get in



1 the car and stepped left foot first off the curb, and
2 felt a crack immediately and pain.

3 Q. So this was additional pain to what you were
4 already experiencing?

5 A. The RSD makes it that way.

6 Q. Like, for example, like right now, are you in
7 pain?

8 A. Yes.

9 Q. Is it a constant pain?

10 A. Yes.

11 Q. And has a doctor told you that that's
12 attributable to the RSD?

13 A. Yes.

14 Q. What doctor told you that?

15 A. Dr. Gelman, Dr. Daitch, Dr. Bellis,
16 Dr. Reynolds, Dr. Duwanjee.

17 Q. Wait, okay. I got "Ronji," who was after
18 "Ronji"?

19 A. Dr. Duwanjee.

20 Q. Duwanjee, okay. Anyone else?

21 MR. LEVIN: You want to read back the
22 recitation of doctors?

23 (The requested portion was read.)

24 A. Dr. Grabow.

1 Q. Okay, let's go back over that list, because I
2 want to know where each of these doctors, where
3 they're located, okay?

4 A. Okay.

5 Q. You seem to have it in your head, so let's
6 start with the first doctor. If you could just name
7 the doctor and name where they're at.

8 A. Dr. DiPretoro, Newark, Delaware.

9 Q. And I know Dr. Gelman. But who else? And I
10 know Dr. Duwanjee, the last one that you named. But
11 Gray --

12 A. Dr. Grabow is at Johns Hopkins.

13 Q. Okay, how long, how many times did you see
14 Dr. Grabow?

15 A. Just once.

16 Q. And who else?

17 A. Dr. Reynolds and Dr. Daitch are both in Fort
18 Myers, Florida. Dr. Bellis is in Cape Coral, Florida.

19 Q. And the other doctor in Fort Myers, Reynolds
20 and what was the other doctor, how do you spell that
21 name?

22 A. Which name?

23 Q. Reynolds and whoever else it was in --

24 A. Daitch, D-a-i-t-c-h.



1 Q. What type of doctor is Dr. Grabow?

2 A. He is an anesthesiologist pain specialist.

3 Q. Okay, how about Reynolds?

4 A. Orthopedic surgeon.

5 Q. Daitch?

6 A. Pain management specialist.

7 Q. And Bellis?

8 A. Podiatrist.

9 Q. Now, when you went to Johns Hopkins, what did
10 they tell you there?

11 A. They told me that I eventually would get to the
12 point where I could walk without the brace, and then I
13 would have to wean myself off the crutches, but that I
14 needed to continue taking the medicines. He
15 prescribed a new medicine, and said that I would never
16 run again. I would get to the point where I could
17 walk unaided but never run.

18 Q. And how long did you wear the brace?

19 A. Which brace?

20 Q. The first one that you had I believe was called
21 a MAFO.

22 A. Um-hum.

23 Q. How long did you wear that?

24 A. Three to four months.



1 MR. LEVIN: And to be clear, the MAFO
2 brace is the type of brace that we would see at the
3 beginning of "Forest Gump" or one of Jerry's Kids,
4 that type of brace? Is that right?

5 THE WITNESS: Yeah, it's a hard plastic
6 Forest Gump-like brace.

7 Q. All right. Now, during that time you were
8 non-weight bearing or weight bearing?

9 A. I was non-weight bearing at the beginning, and
10 then through physical therapy I started to be able to
11 weight bear a little bit.

12 Q. And then you said other braces. What other
13 braces did you use?

14 A. I had a big walking boot.

15 Q. When was that?

16 A. After the MAFO brace.

17 Q. Immediately after?

18 A. I had it prior to and then after, and then when
19 I fractured my foot I wore it also.

20 Q. And how long did you wear that?

21 A. At which time?

22 Q. Well, first, immediately after the MAFO.

23 A. I wore it for about three months.

24 Q. And then you said when you fractured your foot



1 you wore it as well. That wasn't the same time as
2 this?

3 A. That's what I was answering there, because that
4 was after the MAFO.

5 Q. Okay. Then did you wear it again?

6 A. After I fractured my foot?

7 Q. No, I understand that that's what this is. You
8 said which time, so what other time did you wear it?

9 A. I wore it after the first cast was off, before
10 I got the MAFO.

11 Q. Okay, got it. So did you wear it any time
12 after the foot fracture and after you wore it for
13 that, the three months there, did you wear a brace
14 ever again after that?

15 A. No.

16 Q. And did you have physical therapy after that?

17 A. Yes.

18 Q. And when was that?

19 A. In January of '03.

20 Q. And why was that?

21 A. It's part of the treatment for RSD.

22 Q. Was there a break in between?

23 A. I was not in physical therapy while the
24 fracture was healing.



1 Q. So that's what represents that break.

2 A. Yes.

3 Q. Have you been in physical therapy since January
4 then, or since the time of this incident, have you
5 been in physical therapy in some form or fashion?

6 A. Yeah. There's been, there's been some breaks.

7 Q. In physical therapy?

8 A. Yes.

9 Q. And when would those be?

10 A. Well, the past two months I haven't been in,
11 waiting for clearance for it to be paid for. When I
12 go back to Phoenix I have eight more weeks of physical
13 therapy.

14 Q. And is that through worker's comp?

15 A. Yes.

16 Q. In 1993 you had surgery for an accessory
17 navicular coalition. Who did that surgery?

18 A. Dr. DeThomas.

19 Q. And where was that at?

20 A. Lewistown, Pennsylvania.

21 Q. Was that at Lewistown Hospital?

22 A. Yes.

23 Q. And what were your symptoms before that, before
24 the surgery?



1 A. It was irritated when I played soccer, because
2 it was on the inside of my foot.

3 Q. Was that on the left or right foot?

4 A. Left foot.

5 Q. And how did you recover from that surgery?

6 A. I was on crutches for about 10 days.

7 Q. And did you have any other problems with it?

8 A. No.

9 Q. Have you had any other work-related injuries?

10 A. Yes.

11 Q. And could you describe them for me?

12 A. The back injury.

13 MR. LEVIN: You described that one
14 already.

15 THE WITNESS: Described that.

16 Q. Anything else?

17 A. No.

18 Q. Did you have any other symptoms, other than
19 what you've described to me today, in terms of the
20 foot turning cold and purple and the pain that you
21 experienced immediately thereafter, any other
22 symptoms?

23 A. Yes, sometimes it's hot and red.

24 Q. And is that the same area?



1 A. Yes.

2 Q. Anything else?

3 MR. LEVIN: You're asking --

4 A. Numbness.

5 MR. LEVIN: Go ahead.

6 A. Tingling, burning.

7 Q. And how often does any of that occur?

8 A. It feels like that all the time.

9 Q. So you have the pain, the numbness, the
10 tingling and the burning all at the same time?

11 A. Um-hum.

12 MR. LEVIN: I believe somewhere in the
13 records there's a hypersensitivity to touch. Is that
14 correct?

15 THE WITNESS: Yeah. It hurts to put a
16 sock on.

17 MS. MASSARO: Yeah, let's let her, though,
18 her memory.

19 MR. LEVIN: It's all in the record.

20 MS. MASSARO: I know you're trying to
21 help, I understand totally.

22 MR. LEVIN: It's all in the records.

23 BY MS. MASSARO:

24 Q. Did you experience anything else related to the



1 foot or heel as a result of this incident?

2 A. I don't understand.

3 MR. LEVIN: What, yeah, what --

4 Q. Any other symptoms, any other problems related
5 to this incident?

6 MR. LEVIN: That she experiences now?

7 Q. That you've experienced since the incident.

8 A. Well, yeah, I couldn't walk for a long time,
9 and it's affected my life. I couldn't work.

10 Q. I understand that. But I'm talking about in
11 terms of physical, anything else, other than the
12 things that you've described?

13 A. You mean other than the symptoms that I just
14 listed?

15 Q. Yes, yes.

16 A. There's the sensitivity to touch too; the
17 nerves twitch; my toes jump by themselves.

18 Q. Anything else?

19 A. Ongoing pain.

20 Q. So today is your treatment for this then the
21 medication and the physical therapy a few times a
22 week; is that correct?

23 A. Yes. There's nothing else that can be done for
24 the RSD.



1 Q. Do you wear special shoes?

2 A. Yes.

3 Q. And what are they?

4 A. I have orthotics and I have to wear extra-wide
5 shoes.

6 Q. And how often do you wear the orthotics?

7 A. I was wearing them every day, and now I get the
8 new ones when I go back to Phoenix.

9 Q. So do you typically, like, for example, today,
10 you don't have orthotics on. Do you typically have
11 orthotics on every day?

12 A. Until the doctor told me to stop wearing them,
13 yes.

14 Q. When did the doctor tell you to stop wearing
15 orthotics?

16 A. In May. And I get the new ones when I go back,
17 a different type.

18 Q. And how long have you worn orthotics for?

19 A. I got them in July of '03.

20 Q. And who ordered them?

21 A. Dr. Bellis.

22 Q. And do you do any home exercises, aside from
23 your physical therapy?

24 A. I do sit-ups.



1 Q. And you mentioned earlier that you had some
2 breaks throughout. Did you do home exercises during
3 any of those breaks from physical therapy?

4 A. I am supposed to stretch. I stretch.

5 Q. Is that stretch the Achilles, the tendo
6 Achillis?

7 A. Um-hum.

8 Q. And do you do that?

9 A. Yes.

10 Q. And how often do you do that?

11 A. Once a day.

12 Q. And again, in relationship to physically any
13 other, any other complaints as a result of this
14 incident? Do you have any other --

15 A. You mean symptom-wise, life-wise? I don't
16 understand the question.

17 Q. In terms of physically, do you have any other
18 complaints as a result, any other physical complaints
19 as a result of this incident?

20 MR. LEVIN: You can talk about life-wise.

21 Q. Well, that's not what I'm asking. I'm asking,
22 what I'm trying to ascertain, you filed a complaint
23 against Christiana Care for injuries. I'm trying to
24 ascertain what injuries, what your injuries are.



1 A. Well, I'm stuck with the RSD for the rest of my
2 life.

3 Q. Anything else?

4 A. The pain, and all the symptoms that go with the
5 RSD that I previously listed.

6 Q. Right, and I have all that. And what I'm
7 asking, is there anything else, any other injuries
8 that you attribute to this incident?

9 A. Yeah, my left knee, I have IT band syndrome.

10 Q. Okay, and when were you first diagnosed with
11 that?

12 A. A little over a year ago.

13 Q. And who diagnosed you with that?

14 A. Dr. Duwanjee.

15 Q. When did you first report to him with pain in
16 your knee?

17 A. When I moved to Phoenix, transferred my care
18 there.

19 Q. So that was then in January --

20 A. I had said my knee hurt all along. Worker's
21 comp finally agreed to pay for him to evaluate my
22 knee.

23 Q. Who did you tell that your knee hurt?

24 A. Dr. Bellis.



1 Q. And where is Dr. Bellis again? I forgot.

2 A. Cape Coral, Florida.

3 Q. I know you told me that. Okay. Is that the
4 first time that you reported it to a doctor is in
5 Florida?

6 A. No.

7 Q. When was the first time you reported the left
8 knee pain to a doctor?

9 A. That was doctor, Dr. Reynolds.

10 Q. And when was that? What year?

11 A. Beginning of '03.

12 Q. And did Dr. Reynolds relate it back to this
13 incident?

14 A. Yes.

15 Q. And what did he suggest that you do for it?

16 A. I needed to get it evaluated, which he said
17 he'd be more than happy to do, but worker's comp would
18 not agree to, wouldn't agree to have it paid for.

19 Q. So worker's comp sent you to who?

20 A. They drug their feet for over a year until
21 Dr. Duwanjee evaluated my knee.

22 Q. And what did Dr. Duwanjee suggest?

23 A. An MRI.

24 Q. And what did that show or what did he tell you



1 that that showed?

2 A. The MRI, as far as I know, was negative. But
3 symptom-wise it was obvious that I had the IT band
4 syndrome. It doesn't always show in the MRI.

5 Q. And who diagnosed you with the IT band syndrome
6 then?

7 A. Dr. Duwanjee.

8 Q. And what did he suggest that you do for that?

9 A. Physical therapy. He also suggested surgery,
10 which I denied.

11 Q. And why did you deny surgery?

12 A. Because of the chance of it really flaring up
13 the RSD and making my leg a lot worse than it already
14 is.

15 Q. And the physical therapy that you're having two
16 days a week, is that for the knee then?

17 A. It's for the entire leg, to keep the entire leg
18 strong, get it stronger.

19 Q. Any other complaints, physical complaints
20 regarding the incident, other than now your left knee
21 and the RSD, anything else?

22 A. No.

23 Q. Who is your general practitioner or your GP
24 doctor now?



1 A. I just use my GYN.

2 Q. And who is that?

3 A. Dr. Trachtenberg.

4 Q. And how do you spell that?

5 A. T-r-a-c-h-t-e-n-b-e-r-g.

6 Q. And where is Dr. Trachtenberg, what city?

7 A. Phoenix.

8 Q. Phoenix, okay. Other than Dr. Trachtenberg and
9 Dr. Duwanjee, who are you seeing now? Is there anyone
10 else that you're seeing now?

11 A. No.

12 Q. And the doctors that you named earlier, the
13 several doctors that we discussed a few moments ago,
14 has any other doctor treated you for this, for your
15 leg?

16 A. Do I need to go over the list or --

17 Q. No, not at all. We've already got that on the
18 record, so don't worry. Your memory is excellent, by
19 the way.

20 But anyway, other than those, anyone else?

21 A. No.

22 MS. MASSARO: Let me just go off the
23 record for a minute.

24 BY MS. MASSARO:



1 Q. Now I'm just going to go over your responses to
2 interrogatories. That's generated some questions, and
3 then we're pretty much done, okay?

4 MR. LEVIN: Can I use the men's room for
5 one sec?

6 (A short recess was taken.)

7 BY MS. MASSARO:

8 Q. We'll go back on the record.

9 First, I guess we'll just start with this.
10 This is going to jump around a bit. I'm going to go
11 through your interrogatory responses and ask just a
12 few questions to fill in some gaps that I have.

13 First, with regard to your tax returns
14 that we received, we only received one year and that
15 was for the year 2001, and that was for \$48,208. That
16 was the total. Now, that year, was that the year that
17 the incident occurred?

18 A. No.

19 Q. Okay, that was the year before then.

20 A. Correct.

21 Q. Okay. Have you provided any other tax returns
22 to your attorney?

23 A. Uh-uh.

24 Q. Could you say no for the record?



1 A. No.

2 Q. Okay, thanks. Could you provide your tax
3 returns to your attorney then for the five years prior
4 to and the years up until now as well?

5 A. Yes.

6 Q. Just for myself, for my understanding, I'm just
7 going to go back. In 1997 you were 19 years old.
8 Where did you work during that time, or did you?

9 A. I worked for PennDOT during the summer.

10 Q. Is that the only income that you would have
11 that year?

12 A. Yes.

13 Q. And what did you make there, approximately, if
14 you remember?

15 A. Not much.

16 Q. Okay, I can imagine. If you remember your
17 hourly rate.

18 A. I don't remember the hourly rate.

19 Q. Okay, if not, that's fine. In '98 you were 20
20 years old. Where did you work there? When did you
21 work that year?

22 A. I did not work that year.

23 Q. Okay, how about '99 when you were 21?

24 A. I worked for Geisinger Medical Center.



1 Q. What did you do there?

2 A. I was an x-ray tech.

3 Q. And was that full time?

4 A. No.

5 Q. How much of the year did you work there?

6 A. It was per diem. I worked a day here and a day
7 there.

8 Q. So do you know how much you worked total that
9 year?

10 A. I worked -- I started in February and I worked
11 through December, but I filled in as needed.

12 Q. How about the year 2000 when you were 22?

13 A. I worked the first two months at Geisinger, and
14 then I moved to Naples, Florida.

15 Q. And did you work there?

16 A. Yes.

17 Q. What did you do there?

18 A. I was an x-ray tech.

19 Q. And was it the same thing, per diem, as you did
20 at Geisinger?

21 A. No, I signed a seasonal contract with the
22 hospital to work full time.

23 Q. So when did you start working full time in the
24 year 2000?



1 A. Third week of February.

2 Q. And then did you work for the rest of that year
3 full time?

4 A. I worked for that hospital until September, and
5 then I was off for two weeks, and then I started for
6 Aureus. It was all full time.

7 Q. And then that would have gone into the next
8 year, which we do have.

9 A. Correct.

10 Q. That one we have. Then the year I guess, the
11 2002 tax return, which would be for the year of the
12 incident, did you work any time after May of '02?

13 A. No.

14 Q. And do you have any memory of what you earned
15 up until that point of that year?

16 A. I have no idea.

17 Q. We'll just look at your earnings, that's fine.

18 MR. LEVIN: What were you earning per
19 hour --

20 THE WITNESS: I was making 25 an hour.

21 MR. LEVIN: -- for Aureus?

22 THE WITNESS: For Aureus.

23 Q. And did you work full time?

24 A. Yes.



1 Q. Now the next year, 2003, did you work at all?
2 You were 25 at that time, I think.

3 A. I started as a nanny in September. I was
4 unable to find a four-hour-a-day X-ray tech job.

5 Q. And as a nanny, who did you work for?

6 A. Can't think of her name. I can't think of
7 their name.

8 Q. Okay, did you work directly for the family?

9 A. Yes.

10 Q. Or did you go through an agency?

11 A. For the family.

12 Q. Could you provide your attorney with the name
13 of the family later?

14 MR. LEVIN: Sure.

15 A. I'll think of it.

16 Q. Okay. You have a good memory. I'm going to
17 give you a minute.

18 MR. LEVIN: Off the record.

19 (Discussion held off the record.)

20 A. I got it.

21 Q. Okay. You should be a lawyer.

22 A. Perry.

23 Q. That's the last name of the family, P-e-r-r-y?

24 A. Yeah, um-hum.



1 Q. First name?

2 A. Heather.

3 Q. And do you know the husband's name? How about
4 the children, how many children were there?

5 A. Conner; she was pregnant with the second one.

6 Q. Okay. And how old was Conner?

7 A. Sixteen months.

8 Q. And was it a full-time nanny or --

9 A. No, four hours a day.

10 Q. And how long did you do that?

11 A. Three months.

12 Q. Any other work the year of 2003?

13 A. No.

14 Q. Did you do any work moving boxes, where you had
15 to move boxes as part of your job?

16 A. I helped empty boxes.

17 Q. And where was that at?

18 A. With the Perrys.

19 Q. Was that in terms of them moving or something?

20 A. They had moved, yeah.

21 Q. And no other employment then in 2003?

22 A. I think I worked the last couple of weeks for
23 my ex, which then I did through March.

24 Q. So when did you begin? What type of work was



1 that, first of all?

2 A. I was a receptionist.

3 Q. Okay, at what type of company?

4 A. He owned a flooring company.

5 Q. What was the name of it?

6 A. Floor Depot.

7 Q. And when did you start?

8 A. I think it was right before Christmas.

9 Q. And then stayed through March; is that correct?

10 A. Yes.

11 Q. And what were some of the job duties there as a
12 receptionist?

13 A. I answered the phone and greeted customers.

14 Q. And were you paid there, actually?

15 A. Yes.

16 Q. Do you remember what you were paid?

17 A. Six bucks an hour.

18 Q. Going back to when you were a nanny, were you
19 paid there, and obviously you were?

20 A. Yes.

21 Q. How much were you paid there?

22 A. Six bucks an hour.

23 Q. Now, was that reported on your income tax or
24 was that unreported income?



1 A. I filed that year, because I know that they
2 wrote off their --

3 Q. Okay. Now the next year, 2004, that's when you
4 started working at Floor Depot, I guess. Is that
5 correct, or --

6 A. That's incorrect.

7 Q. When did you start working at Floor Depot?

8 A. From December of '03 through March of '04.

9 Q. All right, then the next tax year, 2004, which
10 would have been 2003 -- well, actually, we just went
11 over that. What did you do the next year, which would
12 be --

13 A. After March?

14 Q. Yes.

15 A. Nothing.

16 Q. Through the end of the year?

17 A. I moved back to Pennsylvania. I was unable to
18 find an x-ray tech job.

19 Q. And then when did you work again? When is the
20 first time you worked again?

21 A. April of '05.

22 Q. And what were you doing then?

23 A. Part-time x-ray tech.

24 Q. Where at?



1 A. Valley Radiologists.

2 Q. And where is that?

3 A. Phoenix, Arizona.

4 Q. Is that where you're at to this day?

5 A. Yes.

6 Q. And how often do you work?

7 A. I now work three days a week as a trial.

8 Q. How long have you been doing that for?

9 A. Five weeks, six weeks.

10 Q. And how is that going?

11 A. Okay.

12 Q. And what were you working prior to that?

13 A. Five days a week, four hours a day.

14 Q. And now you're working three days a week?

15 A. Yes.

16 Q. Are you working longer days?

17 A. Yes.

18 Q. So that's the trial part is that you're working
19 longer days?

20 A. Yes.

21 Q. And so you've gradually worked up to this three
22 days a week. How long are you working each day?

23 A. Eight hours, Monday, Wednesdays and Fridays, so
24 I have a day in between.



1 Q. And I think you said in your interrogatories,
2 what are you earning now?

3 A. Twenty-three something.

4 Q. I think that covers it.

5 And we're going back to your interrogatory
6 responses. No. 2, you indicate that 10 minutes
7 following the accident you spoke with Fred. Who is
8 Fred? I know it looks like you don't know Fred's last
9 name. But who is he? What is his title?

10 A. As far as I know, he is a nurse.

11 Q. In what area?

12 A. In the operating room.

13 Q. So had you made it all the way to the operating
14 room then that day with the machine?

15 A. No.

16 Q. Where exactly in the hospital were you when the
17 incident occurred?

18 A. In the hallway outside of an operating room.

19 Q. So you had gone from -- where did you begin
20 your journey when you went, you were going to the
21 operating room, where did you start in the hospital
22 with the x-ray machine?

23 A. There's a room where the processor is, the
24 x-ray processor is with --



1 Q. What floor?

2 A. Second floor within the operating room suite.

3 The machine is kept around the corner from there.

4 Q. I see. So you were actually in the operating
5 room suite then when this occurred?

6 A. Yes.

7 Q. And Fred is an OR nurse?

8 A. Yes.

9 Q. Do you know whether he was a circulating nurse?

10 A. I would say yes.

11 Q. And what was the substance of your conversation
12 with him?

13 A. He had asked why I was walking the way I was,
14 limping, you know, because I wasn't, you know, that
15 morning. And I told him that I had hurt my leg, and
16 he said that I should probably go to PACU and get some
17 ice.

18 Q. And did he say anything else?

19 A. No.

20 Q. Did you have any other conversation with him or
21 anyone else at Christiana about the incident, other
22 than your Employee Health, obviously?

23 A. A lady named Cindy got me the ice in PACU.

24 Q. Anyone else?



1 A. No.

2 Q. And since this event occurred, other than the
3 medical care, have you spoken with anyone at
4 Christiana Care regarding this event, regarding the
5 incident?

6 A. No.

7 Q. Did you speak with Dawn Spitnik about it?

8 A. Yes.

9 Q. When was that?

10 A. When I went downstairs for lunch.

11 Q. On the day of the incident?

12 A. Um-hum.

13 Q. And what was the substance of that
14 conversation?

15 A. Lydia had already explained to her what had
16 happened, and she suggested I go to Employee Health.

17 Q. And did you ever talk to Dawn about it again?

18 A. When I came back upstairs from Employee Health
19 and got my x-rays. That was -- she knew that I had
20 the x-rays, but that was it.

21 Q. And any other phone conversations or anything
22 like that? I realize --

23 A. No.

24 Q. -- you didn't go back. I know you didn't go



1 back, but did you ever talk with her on the phone
2 after this incident?

3 A. No.

4 Q. Anyone else from Christiana Care, did you speak
5 with anyone else from Christiana Care after this
6 incident?

7 A. The nurses that were caring for me in August.

8 Q. Sure.

9 A. The doctors.

10 Q. But anyone else in any type of an official
11 capacity regarding this incident?

12 A. No.

13 Q. These photographs that I showed you earlier and
14 that have been marked as an exhibit, I have copies and
15 I know we'll get the actual photos. Are there any
16 other photographs that you have relating to this
17 incident?

18 A. Yes.

19 Q. What are they of?

20 A. My foot.

21 Q. And when were they taken?

22 A. On different dates throughout a year and a
23 half, almost two years.

24 Q. Beginning immediately after the incident or



1 recently?

2 A. They were beginning in July of '02.

3 Q. Do you have those photographs in your
4 possession? Not today, but in general.

5 A. Yes.

6 Q. And are they color photographs?

7 A. Yes.

8 Q. Approximately how many photographs are there?

9 A. Seventy-five to 100.

10 Q. And --

11 A. I have an album.

12 Q. What are they of? I know they're of your foot,
13 but what exactly?

14 A. Showing the color changes --

15 Q. And are they dated?

16 A. -- and the swelling. Yes.

17 Q. And do they have times?

18 A. No times.

19 Q. Have you provided a copy of those to your
20 attorney?

21 A. Most of them, yeah, he got them.

22 MS. MASSARO: I would like a copy of those
23 as well.

24 MR. LEVIN: Sure, sure.

